REMARKS

Claim 1-12 are pending.

103(a) Rejections

Claim 1, 2, 4-7 and 9-12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Narasimhan et al. ("Narasimhan;" US 6,446,192) in view of Breslau et al. ("Breslau;" US 5,761,512). The Applicant has reviewed the cited references and respectfully submits that the present invention as recited in Claims 1, 2, 4-7 and 9-12 is not anticipated nor rendered obvious by Narasimhan and Breslau, alone or in combination.

The Examiner cites column 9 of Narasimhan, which describes the creation of a custom Java applet. The Examiner argues that creating a custom Java applet shows forming an application-specific Web server. Applicant respectfully maintains that there are manifold differences between a Java applet and a Web server. Applicant respectfully asserts that even Narasimhan distinguishes between a Java applet and a Web server. As described by Narasimhan, the Java applet is used to implement a client user interface and communications between a client and the network interface chip server (see column 8, lines 64-66, of Narasimhan). Therefore, according to Narasimhan, the Java applet is used to communicate with the server; the Java applet is not the server. Thus, Applicant respectfully maintains that, according to Narasimhan, there are differences between a server and a Java applet. As such, Applicant respectfully asserts that creating a Java applet does not show or suggest compiling or forming a server, as recited by independent Claims 1, 6 and 10. In addition, note that column 7, lines 1-3, of Narasimhan state that the network interface chip is an HTTP server, and that HTTP is used for Web pages. One can readily infer from this that the network

interface chip server of Narasimhan is a Web server. Therefore, Applicant also respectfully asserts that creating a Java applet does not show or suggest compiling or forming a Web server, as recited by independent Claims 1, 6 and 10.

Specifically, Applicant respectfully submits that Narasimhan does not show or suggest compiling a Web server as recited in independent Claim 1, nor does Narasimhan show or suggest forming a Web server as recited in independent Claim 6, nor does Narasimhan show or suggest forming a Web server as recited in independent Claim 10.

More specifically, the Applicant respectfully submits that Narasimhan does not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific <u>web servers</u>; ... and ... <u>compiling the web server</u> by selecting from the web server class library and the virtual machine class library classes required to run the web application in the device to form the web server, wherein the Web server is specific to the web application" (emphasis added) as recited in independent Claim 1. Claims 2, 4 and 5 are dependent on Claim 1 and recite additional limitations.

Applicant also respectfully submits that Narasimhan does not show or suggest "a web server class library and a virtual machine class library, each including classes for different web applications for forming different application-specific <u>web servers</u>; and .. a compiler ... to form the <u>web server</u> such that the web server is specific to the web application"

(emphasis added) as recited in independent Claim 6. Claims 7 and 9 are dependent on Claim 6 and recite additional limitations.

In addition, Applicant respectfully submits that Narasimhan does not show or suggest "an application-specific web server core and an application-specific virtual machine that together execute the web application on the device, wherein the application-specific <u>web server</u> core and the application-specific virtual machine are compiled from a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific <u>web servers</u>" (emphasis added) as recited in independent Claim 10. Claims 11 and 12 are dependent on Claim 10 and recite additional limitations.

Furthermore, Applicant submits that Breslau does not overcome the shortcomings of Narasimhan. Applicant respectfully submits that Breslau, alone or in combination with Narasimhan, does not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting from the web server class library and the virtual machine class library classes required to run the web application in the device to form the web server, wherein the Web server is specific to the web application" as recited in independent Claim 1. In addition, Applicant respectfully submits that Breslau, alone or in combination with Narasimhan, does not show or suggest "a web server class library and a virtual machine class library, each including classes

for different web applications for forming different application-specific web servers; and .. a compiler ... to form the web server such that the web server is specific to the web application" as recited in independent Claim 6. Moreover, Applicant respectfully submits that Breslau, alone or in combination with Narasimhan, does not show or suggest "an application-specific web server core and an application-specific virtual machine that together execute the web application on the device, wherein the application-specific web server core and the application-specific virtual machine are compiled from a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers" as recited in independent Claim 10.

In summary, Applicant respectfully asserts that the features of the present invention recited in independent Claims 1, 6 and 10 are not shown or rendered obvious by Narasimhan and Breslau (alone or in combination). Therefore, Applicant respectfully submits that the Examiner's basis for rejecting Claims 1, 6 and 10 under 35 U.S.C. § 103(a) is traversed, and that these claims are in condition for allowance. As such, Applicant respectfully submits that the Examiner's basis for rejecting Claims 2, 4, 5, 7, 9, 11 and 12 under 35 U.S.C. § 103(a) is also traversed, as these claims are dependent on allowable base claims and contain additional limitations that are patentably distinguishable over the combination of Narasimhan and Breslau.

Claim 3 and 8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Narasimhan in view of Breslau and further in view of Madany et al. ("Madany;" US 6,199,196). The Applicant has reviewed the

cited references and respectfully submits that the present invention as recited in Claims 3 and 8 is not anticipated nor rendered obvious by Narasimhan, Breslau and Madany, alone or in combination.

Claim 3 is dependent on independent Claim 1, and Claim 8 is dependent on independent Claim 6. As discussed above, Applicant respectfully contends that Narasimhan and Breslau, alone or in combination, do not show or suggest the present invention as recited in Claims 1 and 6.

Madany does not overcome the shortcomings of Narasimhan and Breslau. Applicant respectfully submits that Madany, alone or in combination with Narasimhan and Breslau, does not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting from the web server class library and the virtual machine class library classes required to run the web application in the device to form the web server, wherein the Web server is specific to the web application" as recited in independent Claim 1. In addition, Applicant respectfully submits that Madany, alone or in combination with Narasimhan and Breslau, does not show or suggest "a web server class library and a virtual machine class library, each including classes for different web applications for forming different application-specific web servers; and .. a compiler ... to form the web service such that the web server is specific to the web application" as recited in independent Claim 6.

In summary, Applicant respectfully asserts that the features of the present invention recited in independent Claims 1 and 6 are not shown or rendered obvious by Narasimhan, Breslau and Madany (alone or in combination). Therefore, Applicant respectfully submits that the Examiner's basis for rejecting Claims 3 and 8 under 35 U.S.C. § 103(a) is traversed, as these claims are dependent on allowable base claims and contain additional limitations that are patentably distinguishable over the combination of Narasimhan, Breslau and Madany.

CONCLUSION

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected Claims.

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-12 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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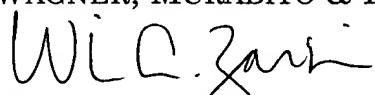
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